

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**JUUL LABS, INC.,**

**Plaintiff,**

**v.**

**THE UNINCORPORATED ASSOCIATIONS  
IDENTIFIED IN SCHEDULE A,**

**Defendants.**

**Civil Action No. 1:19-cv-00715-LO-IDD**

**DECLARATION OF MONICA RIVA TALLEY IN SUPPORT OF  
PLAINTIFF’S REQUEST FOR CLERK’S ENTRY OF DEFAULT**

I, Monica Riva Talley, hereby declare as follows:

1. I am an attorney with the law firm Sterne Kessler Goldstein & Fox PLLC, counsel for Plaintiff Juul Labs, Inc. (“Plaintiff”).
2. I am a member in good standing of the Bar of Virginia, and My Virginia State Bar number is 41840.
3. I submit this Declaration in support of Plaintiff’s Request for Clerk’s Entry of Default and make this Declaration based on my personal knowledge.
4. On July 31, 2019, Plaintiff initiated service of the Verified Complaint, and Defendants’ Summonses in a Civil Action signed by the Clerk of Court on the Defendants located within the United States. On October 21, 2019, Plaintiff filed proof of service affidavits as required by Fed. R. Civ. P. 4(l)(1). The affidavits state Defendants were personally served between August 5, 2019 and September 17, 2019. *See* D.I. 81-126.

5. On July 31, 2019, Plaintiff served a copy of the Court's Order Granting Plaintiff's Motion for Authorizing Service of Process by Email, the Verified Complaint, and Defendants' Summonses in a Civil Action signed by the Clerk of Court as to the certain foreign Defendants located in China via the following contact information:

No.	Defendant's eBay ID	Defendant's Name	PayPal email address
4	qiaotianping-zhengmeixinxi	Min Zhang (敏 张)	qtp_misszhang@outlook.com shiyao227@outlook.com qtp_misszhang@hotmail.com
5	miss_zhang		
7	Vapingpit	Wenjiang Mai	maiwenjiang@hotmail.com misszhanglink2mwj@outlook.com qtplink2mwj@outlook.com
8	savings4u168	Dong Dong Wang (东东 王)	wangpaul668@gmail.com
15	kytech2016_0	Lian Cui Jiang (莲翠 蒋)	kytech2016@163.com
16	szeminhhangy	Xiao Hua Wang (小华 汪)	wangxiaohua588@outlook.com xiaohuawang588@outlook.com wxhua188@outlook.com
22	tyijiafkju		
68	yanshifu482		
24	red-cherry2018	Hai Yan Xiang (海艳 项)	cherry-xiang@outlook.com
33	talfangkoyu	Peng Lin (鹏 林)	penglin188@outlook.com
53	wanyancai559	Hui Qi Lin (辉棋 林)	linhq888@hotmail.com
54	wenwen996 4	Wenbo Lei	wenwen996@aliyun.com

6. On October 21, 2019, Plaintiff filed a Notice of Service of Defendants by Email as required by Fed. R. Civ. P. 4(l)(2). *See* D.I. 128.

7. No answer or response has been filed by the Defendants for whom Plaintiff seeks an entry of default. Plaintiff accordingly files the foregoing Request for Clerk's Entry of Default after the 21-day expiration, as required by Fed. R. Civ. P. 12(a). I declare under penalty of perjury that the foregoing is true and correct.

Date: November 22, 2019

Respectfully submitted,

/s/ Monica Riva Talley

Monica Riva Talley

*Attorney for Plaintiff*